Exhibit E

AXINN

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May 30, 2023

CONFIDENTIAL

VIA EMAIL

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Re: *In re: Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC)

Dear Walter and Mark:

Contemporaneously with this letter, Google is making available a data production
in response to Requests 20, 21, 22, 33, 54, 66, 243, 247, and 296 of Plaintiffs' First Requests for
Production ("RFPs").

This is Google's third data production to Plaintiffs. On April 13, in response to RFPs 21, 33, 116, 159, and
243, Google made available to Plaintiffs both the Google Ad Manager Log-Level Bid Data Set ("GAM
Data Set") that was previously provided to the U.S. Department of Justice ("DOJ") and the data that
Google previously produced to the DOJ from its Header Bidding Monitor system ("Header Bidding
Monitor Data Set"). On May 10, Google made available to Plaintiffs a sample of 100 events pertaining to
each named Publisher Plaintiff from each of the 32 logs that were accessed to create the GAM Data Set,
for April 5, 2023 (to the extent there are recorded events pertaining to a Publisher Plaintiff on such date).

The table below describes, by RFP, each responsive dataset that Google is producing today or has
previously produced. These productions are consistent with the proposals made in Google's Feb. 27
Responses and Objections (with minor exceptions, noted below) and also include the additional fields that
Google agreed to provide in response to Plaintiffs' requests. *See* April 20, 2023 email from Sam Sherman
to Walter Noss and Mark Mao. With this production, Google will have produced a total of 116 terabytes of

data in response to Plaintiffs' RFPs, and Google considers its responses to RFPs 20, 21, 22, 54, 66, 116, 159, 243, 247, and 296 to be substantially complete. As discussed during our May 22 meet-and-confer, Google anticipates making additional productions that will contain its responses to RFPs 239, 240, 244, 245, and 261.

RFP	Description of Responsive Data Production
20	Separately for Google Ads and DV360 and for each year from January 2014 to December 2022 for Google Ads and from January 2016[1] to December 2022 for DV360, for each of the 1,000 largest customers of such tool with U.S. billing addresses (as measured by total web display spend through such tool in such year), data sufficient to show: • An identifying number for the customer; • The customer's name; • The customer's monthly ad spend through such tool on search and web display advertising inventory, respectively; and • The customer's monthly web display ad spend through such tool on AdX and on ad exchanges operated by firms other than Google. (GOOG-AT-MDL-DATA-000508816 (folder: mdl_rfp_020_submission))
21	Data covering the period June 2018 to September 2022 from the Header Bidding Monitor data set previously produced on April 13 as described in Daniel Bitton's April 17 letter (GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502), showing monthly totals of North American publishers[2] web impressions transacted • through Header Bidding (as identified using ███████████ ████████████████████████), • through AdX, • through Open Bidding, • through DFP remnant line items, and • transacted non-programmatically in DFP. (GOOG-AT-MDL-DATA-000508817 (folder: mdl_rfp_021_submission)) Data covering the period from January 2014[3] through December 2022, showing monthly totals of U.S. user[4] web impressions transacted • through AdX,

[1] Although Google initially planned to produce monthly data about DV360 customers' AdX transactions beginning in January 2016, in the course of collecting the data to respond to RFP 20, Google discovered that ████████████ ██. Plaintiffs will however receive data about DV360 customers' transactions through any Google sell-side product before August 2016 in Google's response to RFP 243, with data about AdX, AdMob, and AdSense combined in observations where ██ ███████████.

[2] The geography is based on the region which ██.

[3] Although Google initially planned to produce monthly data about web impressions beginning in January 2014, in the course of collecting the data to respond to RFP 21, Google discovered that █████████████████████ ██ ████████████████████. Plaintiffs will however receive data about all DFP transactions (web and app combined) before December 2016 in Google's response to RFP 243, with data about web and app transactions combined in observations where ████████████████████.

[4] Throughout this letter, "user" refers to the individual person generating the impression by viewing a webpage. By contrast, "customer" refers to the entity using the ad tech tool.

	• through Open Bidding, • through DFP remnant line items, and • non-programmatically in DFP. (GOOG-AT-MDL-DATA-000508818 (folder: mdl_rfp_021_submission)) Data covering the period from January 2014 through December 2022, showing monthly total transaction value (i.e., gross revenue in the exchange auction[5]) for U.S. user web impressions transacted through • AdX and • Open Bidding. (GOOG-AT-MDL-DATA-000508818 (folder: mdl_rfp_021_submission))
22	Data covering the period January 2014 to December 2022 for Google Ads and January 2016[6] to December 2022 for DV360 sufficient to show the total monthly U.S. web display ad spend (based on customer billing address) through each of Google Ads and DV360, separately for AdX and for exchanges operated by firms other than Google. (GOOG-AT-MDL-DATA-000508819 (folder: mdl_rfp_022_submission))
33	Data, from the Header Bidding Monitor data set previously produced on April 13 as described in Daniel Bitton's April 17 letter (GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502), showing for each month from June 2018 to September 2022, • the estimated number of header bidding web impressions for each North American publisher using header bidding in conjunction with Google Ad Manager, and (GOOG-AT-MDL-DATA-000508820 (folder: mdl_rfp_033_submission)) • the total number of North American publishers using Google Ad Manager, broken down by type of publisher ██████████████████████ ████████. (GOOG-AT-MDL-DATA-000508821 (folder: mdl_rfp_033_submission))
54	Data showing, for each month from December 2016[7] to December 2022, • the number of Publishers having at least one web impression for a U.S. user served through DFP, and • the total number of web impressions for U.S. users served through DFP, separately for each classification of publishers ██████████████ ████████████. (GOOG-AT-MDL-DATA-000508822 (folder: mdl_rfp_054_submission))
66	Data showing: • for each month from January 2014 to December 2022, total gross revenue from U.S. user

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[5] ██

[6] As noted in footnote 1 above, ██████████████████████████████████████
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████████████████████████████.

[7] Although Google initially planned to produce monthly data about web impressions beginning in January 2014, in the course of collecting the data to respond to RFP 54, Google discovered that ████████████████
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███ Plaintiffs will however receive data about all DFP transactions (web and app combined) before December 2016 in Google's response to RFP 243, with data about web and app transactions combined in observations where ██████████████████████

	web impressions transacted through AdX and Open Bidding (i.e., total AdX and Open Bidding revenue before Google's sell-side revenue share is applied); and (GOOG-AT-MDL-DATA-000508823 (folder: mdl_rfp_066_submission)) • for each month from February 2014 to December 2022, total Google Ad Manager ad-serving fees charged to all publishers worldwide. (GOOG-AT-MDL-DATA-000508824 (folder: mdl_rfp_066_submission))
116	Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter. (GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501)
159	Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter. (GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501)
243	Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter. (GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501) Google also previously produced the Header Bidding Monitor Data Set on April 13, as described in Daniel Bitton's April 17 letter. (GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502) For each month from January 2014 to December 2022, the following monthly data on web display transactions through Google Ads involving customers with U.S. billing addresses: (i) total impressions; (ii) total clicks; (iii) total amount paid by customers; and (iv) total amount paid to publishers (for AdX, AdSense, and YouTube transactions) or total amount paid to third-party exchanges. In addition, this Google Ads data will include fields sufficient to determine those monthly aggregates for each unique combination of: (v) customer (███████████); (vi) ad format (█████████); (vii) cost type (██████████████████); (viii) inventory source (███████████████████); (ix) device type (██████████████); and (x) transaction type (█████████████████████). (GOOG-AT-MDL-DATA-000486626 to GOOG-AT-MDL-DATA-000488277 (folder: mdl_rfp_243_google_ads_submission)) For each month from January 2016 to December 2022, the following monthly data on web display transactions through DV360 involving customers with U.S. billing addresses: (i) total impressions; (ii) total clicks; (iii) total media cost (████████████████████████████████); (iv) total DV360 platform fees charged by Google; and (v) total fees paid to third parties. In addition, this DV360 data will include fields sufficient to determine those monthly aggregates for each unique combination of: (vi) customer (█████████████); (vii) publisher offering its inventory on AdX or AdSense (█████████████); (viii) ad format (████████); (ix) cost type charged to advertisers by DV360 (█████████████); (x) inventory source (█████████████████████); (xi) device type (██████████████); and (xii) transaction type (████████████████████). (GOOG-AT-MDL-DATA-000488278 to GOOG-AT-MDL-DATA-000508815 (folder: mdl_rfp_243_dv360_submission))

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[8] As noted in footnote 1 above, ██
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For each month from January 2014 to December 2022, the following monthly data on web display transactions through AdX[9] and Open Bidding involving U.S. users: (i) total impressions; (ii) total clicks; (iii) total gross revenue in the exchange auction; (iv) total amount paid to publishers; and (v) total fees charged by Google (separate from any share of gross revenue retained by Google). In addition, this AdX/Open Bidding data will include fields sufficient to determine those monthly aggregates for each unique combination of: (vi) publisher (███████████ ██████████████); (vii) ad format (█████████); (viii) ad buying tool used in AdX (██████████████) or ad exchange used in Open Bidding (████████████); (ix) device type (███████████); and (x) transaction type (███████████).

(GOOG-AT-MDL-DATA-000066537 to GOOG-AT-MDL-DATA-000482007 (folders:
- mdl_rfp_243_adx_submission;
- mdl_rfp_243_adx_crosswalk))

For each month from January 2014 to December 2022, the following monthly data on web[10] display ads served through Google Ad Manager (excluding AdX, Open Bidding, and AdSense "backfill" from Google Ad Manager) involving U.S. users: (i) total impressions and (ii) total clicks. In addition, this Google Ad Manager data will include fields sufficient to determine those monthly aggregates for each unique combination of: (iii) publisher (███████████ ██████████████); (iv) ad format (█████████); (v) device type (███████████); (vi) reservation type (███████████); (vii) header bidding exchange; and (viii) header bidding wrapper.[11]
(GOOG-AT-MDL-DATA-000482008 to GOOG-AT-MDL-DATA-000482531 (folder: mdl_rfp_243_dfp_reservations_submission))

For each month from January 2015 to December 2022, the following monthly data on web[12] display ads served via AdSense "backfill" through Google Ad Manager involving U.S. users: (i) total impressions; (ii) total clicks; (iii) total gross revenue in the AdSense auction; and (iv) total amount paid to publishers.[13] In addition, this AdSense "backfill" data will include fields sufficient to determine those monthly aggregates for each unique combination of: (v) publisher (███████████████████████████); (vi) ad format (██████████); and (vii) device type (████████████).
(GOOG-AT-MDL-DATA-000482532 to GOOG-AT-MDL-DATA-000486515 (folders:
- mdl_rfp_243_adsense_backfill_2015_2018_submission
- mdl_rfp_243_adsense_backfill_2019_2023_submission)

For each month from January 2015 to December 2022, data showing: (i) total impressions served by Google Ad Manager, separately for each publisher (████████████), user location (██████

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[9] In the course of collecting the data to respond to RFP 243, Google discovered that ███████ ██ ████████████████████████████████

[10] As noted in footnotes 2 and 6 above, ██ ██████████████████████████████

[11] In the course of preparing its response to RFP 243, Google determined that ███████████ ███.

[12] As noted in footnote 6 above, ██ ████████████████████████████████████

[13] ███

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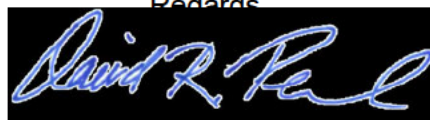|	
	██████████) and environment (██████████)[14]; (ii) total monthly billed impressions served by Google Ad Manager, separately for each publisher worldwide (██████████████████); and (iii) total ad-serving fees charged by Google Ad Manager, separately for each publisher worldwide (██████████████). (GOOG-AT-MDL-DATA-000508825 (folder: mdl_rfp_243_gam_impressions_fees_submission); GOOG-AT-MDL-DATA-000486516 to GOOG-AT-MDL-DATA-000486625 (folder: mdl_rfp_243_dfp_fees_submission))
247	Data showing, for each month between January 2014 and December 2022, the total number of U.S. user AdX web impressions won by - Google Ads, - DV360, and - each non-Google ad buying tool purchasing through AdX (██████████████). (GOOG-AT-MDL-DATA-000508826 (folder: mdl_rfp_247_submission))
296	Data from May 2020 through March 2023 showing, for each month, and for each Google Ads account ID that Plaintiffs identify as associated with each "Advertiser Plaintiff," the number of times that account logged into Google Ads.[15] (GOOG-AT-MDL-DATA-000066536 (folder: mdl_rfp_296_submission))

Plaintiffs can access the data production described above via Microsoft Azure. Google will make this production available to the following Azure-associated email addresses, as was done with prior data productions. Please let us know if any other email addresses should be included.

- ██████████████████
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The contents of this letter are confidential and Google is marking this letter Confidential consistent with the Confidentiality Order.

Regards,

David R. Pearl

David R. Pearl

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[14] Although Google initially planned to produce monthly data for web impressions and app impressions separately beginning in January 2015, in the course of collecting the data to respond to RFP 243, Google discovered that ██ ██.

[15] Google located login information for Advertiser Plaintiff Cliffy Care Landscaping, using two IDs provided by Plaintiffs and two additional IDs that Google identified via manual review of customer names.